

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE NATIONAL NEWSPAPER ASSOCIATION
REDIRECTED FROM WITNESS PATELUNAS
(NNA/USPS-ST44-2)

The United States Postal Service hereby provides its response to the following interrogatory of the National Newspaper Association: NNA/USPS-ST44-2, filed on July 31, 2000, and redirected from witness Patelunas.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
August 9, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF NATIONAL NEWSPAPER ASSOCIATION
(Redirected from witness Patelunas, USPS-ST-44)**

NNA/USPS-ST44-2. Please provide the 95 percent confidence intervals for Cost Segment 3.1 (Mail Processing – Clerks and Mailhandlers) for the Within-County subclass for:

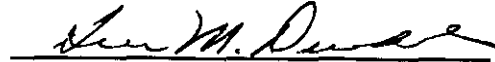
- (i) Base Year costs for R97-1 (1996):
- (ii) Base Year costs for R2000-1 (1998); and
- (iii) 1999 costs calculated using the R2000-1 costing methodology.

Response:

- (i) In Docket No. R97-1, witness Degen's direct testimony, USPS-T-12, Table 6 contains the requested information.
- (ii) In Docket No. R2000-1, witness Ramage's testimony, USPS-T-2, Table 1 contains the requested information.
- (iii) This material is not available. It has not been prepared as part of the response to Order No. 1294.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Susan M. Duchek", is written over a horizontal line.

Susan M. Duchek

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